

Federal Defenders
OF NEW YORK, INC.

One Pierrepont Plaza-16th Floor, Brooklyn, NY 11201
Tel: (718) 330-1200 Fax: (718) 855-0760

David E. Patton
*Executive Director and
Attorney-in-Chief*

Deirdre D. von Dornum
Attorney-in-Charge

February 22, 2022

By ECF (under seal) and E-Mail

The Honorable Judge Margo Brodie
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Jason Christopher Hughes 17-CR-173 (MKB)

Dear Chief Judge Brodie:

We write to respectfully request that the Court direct the U.S. Marshals Service to transport Mr. Hughes from Richmond University Medical Center in Staten Island, New York directly to his designated BOP facility (FMC Devens) on or before February 25, 2022. We further request that the Court extend Mr. Hughes's surrender date from today, February 22, 2022, until the Marshals are able to transport him to FMC Devens.

Factual Background

On December 14, 2021, this Court sentenced Mr. Hughes to a term of imprisonment of one year and one day, with a self-surrender date of February 22, 2022.

On February 14, 2022, Mr. Hughes was involuntarily hospitalized following a suicide attempt. He remains hospitalized at Richmond University Medical Center. His psychiatric team considers him a continuing high risk of suicide. Because of this risk, the Medical Center is only willing to discharge him to the custody of law enforcement who can transport him directly to FMC Devens. At the same time, we are concerned that if his surrender is delayed by more than a week, he could lose his placement at FMC Devens, which appears to be the most appropriate facility for him. If he were to surrender to the Marshals or to MDC without a court order directing that he be taken forthwith to FMC Devens, it is highly likely that he would spend some time at MDC and then additional time in transit; given his psychiatric and medical conditions, that seems ill-advised.

We understand this is a considerable burden on the Marshals. We have sought to find other safe alternatives, but have not been able to find one. Until today, we had not understood from the Medical Center how acute their concern was about Mr. Hughes.

Requested Relief

For all of those reasons, and in these highly unusual circumstances, we respectfully ask that the Court direct the U.S. Marshals to take Mr. Hughes into custody from Richmond University Medical Center and transport him directly to FMC Devens on or before February 25, 2022.

Thank you for your consideration.

Respectfully Submitted,
/s/ Deirdre D. von Dornum
Deirdre D. von Dornum
Amanda L. David
Counsel for Raymond Johnson (charged
Jason Christopher Hughes)
Federal Defenders of New York Inc.
One Pierrepont Plaza, 16th Floor
Brooklyn, NY 11201
917-623-9894

cc: AUSA Michael Keilty

PTSO Melissa Roman

USMS Peter Lee

Adam Johnson, Esq. (Regional Counsel, BOP)